

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

BRIANA BECKWORTH,

Plaintiff,

VS.

JEFFERSON COUNTY, NEBRASKA

d/b/a JEFFERSON COUNTY

AMBULANCE DISTRICT 33,

Defendant.

CASE NO. 4:06CV3077

PROTECTIVE ORDER

This matter is before the court on the joint stipulation of the parties. The court, being fully informed, finds that the Stipulation [22] should be approved. Accordingly,

IT IS ORDERED:

1. Defendant will produce to plaintiff all documents in defendant's possession, and requested by plaintiff in her Request for Production of Documents, request number 20, number 31 and number 32, including but not limited to any investigatory records or reports regarding Kevin Hergott or the Ambulance District and/or Kevin Hergott's personnel file, except those document documents which are protected by the work-product privilege or the attorney/client privilege.

2. The documents produced by defendant and any of their contents shall not be disseminated or disclosed to any third parties, in any fashion, including to clients, unless clients specifically agree to nondisclosure of the documents or information to third-parties.

under any circumstances, except that any expert presently designated or who may be designated in the future may read the documents in preparation for the giving of sworn testimony.

The designated experts and clients, however, shall be subject to all the terms and conditions of this Protective Order and shall not photocopy, make notes from or in any manner reproduce the documents. Neither shall the designated experts or clients discuss the contents of the documents except during the course of their sworn testimony in this matter, nor shall they in any fashion disseminate the contents of the documents as discussed herein. Any use of the documents not specifically provided for in this Protective Order is prohibited without further order of the court.

3. The documents produced shall at all times remain confidential, and be retained by counsel in such a manner that they cannot be viewed by third persons not previously designated in the paragraphs above, and upon the conclusion of this litigation, any copies of the documents shall be returned to counsel for defendant.

5. Specific restriction on use of the documents at trial shall be raised by motion at the time of trial.

DATED January 9, 2007.

BY THE COURT:

**s/ F.A. Gossett
United States Magistrate Judge**